

ROMNEY FOR PRESIDENT, INC.

June 27, 2007

Mr Jeff S Jordan
Supervisory Attorney
Complaints Examinations & Legal Administration
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE MUR 5918

Dear Mr Jordan

On behalf of Romney for President, Inc (hereinafter "RFP") and Darrell Crate, RFP Treasurer, we write this letter in response to a complaint filed with the Commission by Francis X Raskauskas and assigned MUR 5918. Because Mr Raskauskas' complaint is based upon a fundamental misunderstanding of the fundraising event in question, and because the complaint is facially insufficient to state a violation as to RFP, we respectfully request the Commission dismiss the complaint as to RFP and take no further action in this matter.

The June 1, 2007 event referenced in the complaint was paid for by, sponsored by, and held solely for the benefit of the Republican State Committee of Delaware (hereinafter "Delaware GOP"). It was not a joint fundraiser under 11 C.R. § 102 17, and no funds raised at the event were deposited into any RFP accounts whatsoever. Governor Romney appeared as a "special guest" at the event, but RFP was not involved in the creation or distribution of the invitations about which Mr Raskauskas complains. Finally, the event raised funds for the Delaware GOP's *federal account*, and all contributions were therefore within the limitations and prohibitions of federal law.

Such activities are wholly permitted. Moreover, the nature of the event simply does not implicate the joint fundraising rules of § 102 17, as Mr Raskauskas appears to suggest. Accordingly, we respond to Mr Raskauskas' five allegations as follows:

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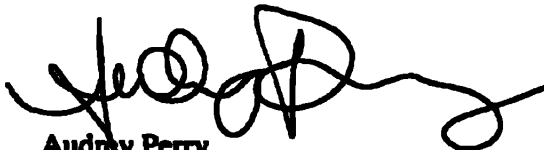
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- (1) The invitations in question were not prepared by RFP, but instead were prepared and distributed by the Delaware GOP for an event sponsored by the Delaware GOP,
 - (2) RFP did not distribute the invitations to the lists in question, but instead the invitations were distributed by the Delaware GOP,
 - (3) No "in-kind" contribution exists or existed,
 - (4) It was perfectly proper for the Delaware GOP, the sole event sponsor, to be the recipient of event RSVPs, and
 - (5) All funds raised at the event were solely for the Delaware GOP, such that all checks for the event were properly written to the Delaware GOP

Given these facts, the complaint is facially insufficient to state a violation as to RFP. We respectfully request that the Commission dismiss the complaint and take no further action in this matter.

Sincerely,



Kathryn Biber Chen
General Counsel



Audrey Perry
Deputy General Counsel